

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Randy Jay Spencer,	:	Bankruptcy No. 24-10166-JCM
	:	
Debtor.	:	Chapter 13
	:	
Randy Jay Spencer,	:	
	:	Document No.
Movant,	:	
	:	Related to Document No.
v.	:	
	:	
No Respondents,	:	
	:	
Respondent.	:	

**MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES, PLAN,  
STATEMENT OF FINANCIAL AFFAIRS, DECLARATION REGARDING  
ELECTRONIC FILING, AND RELATED DOCUMENTS**

And now comes Randy Jay Spencer (hereinafter “Debtor”), by and through his counsel Brian C. Thompson, Esquire and Thompson Law Group, P.C., and files this Motion for Order Extending Time to File Schedules, Plan, Statement of Financial Affairs, Declaration Re: Electronic Filing and Related Documents representing as follows:

1. On March 26, 2024, Debtor filed a *pro se* emergency voluntary petition under Chapter 13 of the Bankruptcy Code.
2. All deficient filings are due on April 23, 2024.
3. Bankruptcy Rule 1007 provides, that on motion for cause shown, the court may order an extension of the time in which debtors must file their Schedules.
4. Debtor is still in the process of gathering bills, paystubs, and other documentation necessary to complete his bankruptcy schedules.

5. The Debtor expects to be able to complete this process on or before the extended deadline proposed herein. Accordingly, the Debtor respectfully submits that cause under Bankruptcy Rule 1007 to extend the time to file Schedules and related documents exists.

6. The Debtor anticipates that he will be able to file his Schedules, Plan, and Statement of Financial Affairs, Attorney Disclosure Statement, Declaration Re: Electronic Filing, Employee Income Record, Summary of Schedules and other related documents on or before May 7, 2024.

7. No parties will be prejudiced by the relief requested herein.

Wherefore, Debtor Respectfully requests an entry of an order granting the relief requested herein and such other and further relief as is just and proper.

Respectfully submitted,

Dated: April 23, 2024

/s/Brian C. Thompson, Esquire  
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